

EXHIBIT 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
MDL-NO. 16-2738 (FLW) (LHG)

IN RE: JOHNSON & JOHNSON

TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

ORAL DEPOSITION OF:

DANIEL L.
CLARKE-PEARSON, MD

VOLUME 2

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FRIDAY, AUGUST 27, 2021

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MASTROIANNI & FORMAROLI, INC.

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1 are?

2 **A. That's part of the explanation, but not**
3 **the whole explanation.**

4 **(Off-the-record discussion)**

5 **(Lunch recess)**

6 BY MS. BROWN:

7 Q. Welcome back, Dr. Clarke-Pearson.

8 **A. Thank you.**

9 Q. We'll try to pretty briefly finish up
10 our discussion regarding Ms. Newsome.

11 Just to reorient ourselves, prior to
12 the break, am I correct that you had identified age
13 as a cause of Ms. Newsome's [REDACTED]?

14 **A. Increasing age, yes, is a cause.**

15 Q. You had, of course, identified talc as
16 a cause of Ms. Newsome's [REDACTED],
17 correct?

18 **A. Yes.**

19 Q. And you had identified a factor or a
20 number of factors that are yet unknown as a cause or
21 causes of Ms. Newsome's [REDACTED], correct?

22 **A. Yes.**

23 Q. In terms of what percentage in
24 Ms. Newsome's case you would assign to each one of
25 those factors, can you give an opinion on that?